

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

RECEIVED

In the Matter of)

SEP - 5 1995

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)
Amendment of Section 73.202(b),)
Table of Allotments,)
FM Broadcast Stations.)
(Rose Hill, Trenton, Aurora)
and Ocracoke, North Carolina))

MM Docket 95-88
RM-8641
RM-8688
RM-8689

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

DOCKET FILE COPY ORIGINAL

To: Chief, Allocations Branch

REPLY OF DUPLIN COUNTY BROADCASTERS TO COUNTERPROPOSAL

Duplin County Broadcasters ("DCB"), by its attorneys and pursuant to FCC Public Notice, Report No. 2092, Mimeo No. 55394, released August 21, 1995, hereby replies to the August 10, 1995 "Comments and Counterproposal of Aurora Broadcasting" ("Counterproposal") in the above-captioned matter.^{1/} In reply thereto, the following is respectfully shown:

1. DCB, the licensee of FM Station WBSY, Channel 284A, Rose Hill, North Carolina, seeks reassignment of Channel 284 from Rose Hill to Trenton, North Carolina; an upgrade of the allotment from Class A to Class C2; and modification of the license of WBSY

^{1/}Also filed on August 10, 1995 were the "Comments and Counterproposal of JEE Broadcasting, Inc., L.P." ("JEE"), seeking the allotment of Channel 284C3 to Ocracoke, N.C. Thereafter, on August 25, 1995, JEE filed a "Motion to Dismiss the Counterproposal of JEE Broadcasting, Inc., L.P." JEE stated therein that it would no longer pursue its counterproposal, and that it was filing its motion in advance of the established deadline for replies to counterproposals so that "the Commission's staff would not be additionally burdened with the requirement to review commentary filed by other parties who might respond to JEE's original Counterproposal." In reliance on those representations by JEE, DCB will not burden the Bureau's staff by replying to JEE's proposal at this time. However, as the Bureau has not yet acted formally on JEE's motion, DCB respectfully reserves the right to submit reply comments thereto in the unlikely event that JEE's motion to withdraw the proposal for the Ocracoke allotment is not granted.

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accordingly. The Counterproponent proposes the allotment of Channel 283A to Aurora, North Carolina, which would preclude DCB's proposal. It is hereinbelow shown that Trenton is the preferred allotment under the priorities set forth in Revision of FM Assignment Policies and Procedures, 90 FCC 2d 88, 92 (1982). However, DCB has located an alternate channel available for allotment to Aurora, which will enable the Commission to grant both allotments.

A. Comparative analysis.

2. The allotment priorities set forth in Revision of FM Assignment Policies and Procedures, supra, are (1) first full-time aural service; (2) second full-time aural service; (3) first local service; and (4) other public interest matters. In the instant case, the Trenton and Aurora proposals would each bring first local service to their respective communities. When "other public interest matters" are considered, however, Trenton is the preferred allotment.

3. The Trenton proposal would make the most efficient use of the spectrum, by maximizing service to the largest population and the largest geographic area. Specifically, the reallocation of Channel 284, from a Class A station at Rose Hill to a Class C2 station at Trenton, will enable WBSY to dramatically increase the population served within its 60 dBu contour, from 36,354 to 347,878 persons^{2/}, and to increase the area encompassed within

^{2/}DCB's original consulting engineer, William J. Pennington, III, had calculated the total population within the Trenton station's proposed 60 dBu contour as 336,401 persons. DCB's

WBSY's 60 dBu contour to 8,559 kilometers, without creating any unserved or underserved loss area. On the other hand, the Aurora proposal is calculated to serve only 31,096 persons, in an area of just 2,134 square kilometers, none of which is presently unserved or underserved^{3/}. Thus, the proposed allotment to Trenton will serve more than eleven times the number of persons as would be served by an allotment to Aurora, and more than four times the geographic area as would be served by an allotment to Aurora. In view of the far more efficient use of spectrum that would be made by the Trenton facility, the Trenton allotment should be preferred.

4. Neither Trenton nor Aurora is located within an urbanized area. Trenton, however, is the seat of Jones County, North Carolina, which has no locally licensed aural facilities anywhere in the county. On the other hand, Aurora, located in Washington County, is not the county seat, and there are a number of broadcast stations already licensed to communities in Washington County which serve the needs and interests of Washington County residents^{4/}. Thus, the Trenton allotment would be a fairer, more equitable distribution of service, by ensuring that the

current consulting engineer, William Culpepper & Associates, Inc., upon further study, has recalculated the total population within the Trenton station's proposed 60 dBu contour as 347,878 persons.

^{3/}Engineering Statement of William Culpepper & Associates, Inc., attached hereto as Exhibit A.

^{4/}Id.

needs and interests of Trenton, and also surrounding Jones County, are served.

5. Contrary to the Counterproponent's assertions (Counterproposal, page 2), Trenton should not be deemed a "quiet village." In the August 25, 1995 "Reply Comments Of Duplin County Broadcasters" ("August 25 Reply"), incorporated herein by reference^{5/}, DCB showed (at page 9) that the Commission previously has rejected "quiet village" allegations and allotted frequencies to communities with attributes similar to Trenton, citing Bloomington and Nashville, Indiana, 4 FCC Rcd 5764 (Chief, Alloc. Br., 1989) (first service allotted to alleged "quiet village" of a few hundred people which was the county seat), and Bartow, Chauncey, Dublin, Eastman, Jeffersonville, Lyons, Soperton and Unadilla, Georgia, 4 FCC Rcd 6876 (Chief, Alloc. Br., 1989), recon. dismissed, 5 FCC Rcd 442 (Chief, Alloc. Br., 1990) (channel allotted over "quiet village" objections to a self-governing community of 350 persons).

6. Nor is there any basis for the Counterproponent to question Trenton's status as a "community" for allotment purposes (Counterproposal, page 3). The August 1995 Reply (at pages 3-9) showed that Trenton, the county seat of Jones County, is a self-governing, economically self-sufficient community with its own identity and distinct local characteristics and interests.

^{5/}A copy of the August 25 Reply is attached hereto as Exhibit C for the convenience of the Bureau.

7. The 1990 U.S. Census population count for Trenton is artificially small. The August 25 Reply noted (at pages 5 and 9) that the City has not formally annexed areas just outside Trenton proper whose residents consider themselves to be part of Trenton. Approximately 1,000 people live within a couple of miles of Trenton's formal borders, in Jones County, which has no community with an allotted local service. Indeed, as noted in the August 25 Reply (at Exhibit 5), the City of Trenton provides some municipal services to areas in the county just beyond Trenton's formal borders. According to the 1990 Census, Jones County has a population of 9,414. The 1990 Census shows Aurora with a population of 654.

8. The August 25, 1995 Reply further showed (at page 6) that the City of Trenton has unique needs that are not addressed by presently received broadcast media. More than one third of the population of Trenton is Black (August 25 Reply, page 8).

9. The August 25 Reply showed (at pages 10-11) that the reallocation of Channel 284 will not deprive Rose Hill of its only aural service, and any loss areas would continue to be well-served. In sum, the significant public interest benefits of the reallocation to Trenton would outweigh the impact of any service loss.

B. Alternate Aurora allotment.

10. DCB has determined that Channel 221A can be allotted to Aurora as an alternative to Channel 283A, in order to resolve the conflict with DCB's proposal for Channel 284C2 at Trenton. The

engineering report by DCB's consulting engineer, William Culpepper & Associates, Inc., attached hereto as Exhibit A, shows that Channel 221A can be allotted at a reference point of 35° 18' 13" North Latitude, 76° 47' 18" West Longitude, near the center of the town of Aurora, with no unresolved spacing issues.

11. The proposed allotment of Channel 221A at Aurora meets all spacing requirements except with respect to the presently licensed facility of WQSL, Channel 222C2, Jacksonville, NC, and the application of American Family Association ("AFA") for a new non-commercial educational FM on Channel 220A at New Bern, North Carolina (File No. BPED-950626MA). However, both of these spacing questions have been resolved.

12. WQSL recently filed a license application (File No. BLH-950612KD) to cover construction at a new site. The WQSL site change eliminates the spacing conflict with Channel 221A at Aurora.

13. AFA has agreed to file a frequency change amendment to its pending application for a new NCE FM station at New Bern, in order to accommodate the proposed allotment of Channel 221A to Aurora. Attached hereto as Exhibit B is a statement signed by Donald Wildmon, President of AFA, by which AFA agrees to file an amendment to its application, to specify Channel 211 in lieu of Channel 220. Thus, Channel 221A can be allotted to Aurora, contingent upon AFA amending its application to specify a channel other than Channel 220 at New Bern. Bisbee and Green Valley, Arizona, 6 FCC Rcd 1330 (Acting Chief, Alloc. Br., 1991).

14. If Channel 221A is allotted to Aurora in lieu of Channel 283A, there would be no conflict with allotment of Channel 284C2 to Trenton, as proposed by DCB.

WHEREFORE, the premises considered, it is respectfully submitted that Channel 284C2 at Trenton, North Carolina, should be substituted for Channel 284A at Rose Hill, North Carolina, and the license of WBSY should be modified accordingly.

Respectfully submitted,

DUPLIN COUNTY BROADCASTERS

By



Peter Gutmann
Ellen S. Mandell
Its Attorneys

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(202) 296-0600

September 5, 1995

A

DUPLIN COUNTY BROADCASTERS

WBSY

TRENTON, NORTH CAROLINA

ENGINEERING EXHIBIT

September 1995

William Culpepper & Associates
900 Jefferson Drive
Charlotte, NC 28270

DUPLIN COUNTY BROADCASTERS

TRENTON, NORTH CAROLINA

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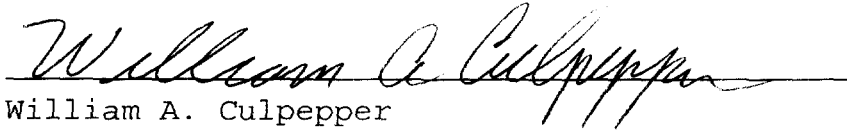
DUPLIN COUNTY BROADCASTERS

TRENTON, NORTH CAROLINA

DECLARATION

I declare, under penalty of perjury, that I have prepared the attached Engineering Exhibit for Duplin County Broadcasters, and that all of the facts therein, except for facts of which the Federal Communications Commission may take official notice, are true to the best of my knowledge and belief; and that I am a Registered Professional Engineer in the State of North Carolina.

Executed on September 1, 1995.


William A. Culpepper

900 Jefferson Drive
Charlotte, NC 28270
704-365-9995

DUPLIN COUNTY BROADCASTERS

TRENTON, NORTH CAROLINA

NARRATIVE

This exhibit supports the attached Reply of Duplin County Broadcasters to a Counterproposal of Aurora Broadcasting in MM Docket No. 95-88. Duplin County Broadcasters (hereafter Duplin) has filed a Petition for Rule Making to change the allotment of channel 284A at Rose Hill, North Carolina to channel 284C2 at Trenton, North Carolina, and to upgrade the facilities of WBSY accordingly. Aurora Broadcasters (hereafter Aurora) filed a counterproposal to allot channel 283A to Aurora, North Carolina, precluding the Duplin proposal.

Page 3 is a spacing study for channel 221A at 35° 18' 13" north and 76° 47' 18" west. These coordinates are near the center of the town of Aurora. This study shows that this reference point meets the spacing requirements of §73.207 except for the licensed facility of WQSL, channel 222C2, at Jacksonville, North Carolina, and for a non-commercial educational application of American Family Association (hereafter AFA) on channel 220A at New Bern, North Carolina (BPED-950626MA).

A license application has been filed to cover the WQSL construction permit (BLH-950612KD). Upon grant of the license, the conflicting site will be deleted.

A facility equivalent to that applied for by AFA on channel 220A at New Bern can be accommodated on channel 211. Page 4 is a study showing the relationship of the alternate New Bern channel 211 protected and interfering contours to the relevant contours of other stations and proposals, as well as spacings to stations and proposals on the fifty-third and fifty-fourth adjacent channels.

WECT, Wilmington, North Carolina is the only "affected" channel six station of the substitute channel 211 proposal. Figure 1 shows that the 67.3 dBu interfering contour of the channel 211 facility does not overlap the 47 dBu protected contour of WECT-TV. Also, an applicant for channel 211 at New Bern would be entitled to use the 6 dB directional antenna credit, making the interfering contour 73.3 dBu, further reducing the potential for interference to WECT. Figure 1 conclusively demonstrates that substitution of channel 211 for channel 220 at New Bern will not create interference to television station WECT.

Since the reference point proposed for Aurora in this reply is near the center of the town, and because of the clearance to other stations, there is reasonable assurance that a transmitter site will be available should anyone elect to apply for a construction permit.

DUPLIN COUNTY BROADCASTERS

NARRATIVE...(continued)

Trenton has a population of 248, and Aurora has a population of 654. However, the population inside the 60 dBu contour of a class C2 facility at the Trenton reference point will cover an area of 8559 square kilometers and 347,878 people, while a class A facility at the reference point preferred by Aurora Broadcasting will cover only 2134 square kilometers and 31,096 people. (Population data is taken from the 1990 Census Bureau data.)

Trenton is the county seat of Jones County. Jones county has a population of 9414, and there is no broadcast station assigned to any community in the county. Aurora is in Beaufort County, where Washington is the county seat.

Washington has four broadcast stations (WCZI-FM, WDLX-FM, WRRF-AM, and WTOW-AM). Bellhaven, another town in Beaufort County, has an FM station (WKJA-FM). There are now five broadcast stations in Beaufort county, and implementation of the Aurora Broadcasting counterproposal would make six, whereas Jones County has no broadcast station, and adoption of the Duplin proposal would provide Jones County with its first local service.

Figure 2 shows the 60 dBu contour of a class A facility at the Aurora Broadcasting reference point, operating with 6 kilowatts at 100 meters HAAT. Also shown are 60 dBu contours of licensed FM stations that are now providing full-time aural service to the area. It is shown on this figure that the area that would be covered by the Aurora proposal now receives a minimum of six full-time aural services, therefore, the allotment of channel 283A to Aurora will not provide service to any under-served area. Stations shown on Figure 2 are identified on page 6.

WILLIAM CULPEPPER & ASSOCIATES
900 JEFFERSON DR - CHARLOTTE NC 28270

DUPLIN COUNTY BROADCASTERS
STUDY AT AURORA, NORTH CAROLINA

REFERENCE		DISPLAY DATES
35 18 13 N	CLASS A	DATA 07-28-95
76 47 18 W	Current rules spacings	SEARCH 08-31-95
----- CHANNEL 221 - 92.1 MHz -----		

CALL	CH#	CITY	STATE	BEAR'	D-KM	R-KM	MARGIN
AP220	220A	New Bern	NC	233.5	27.75	71.5	-43.75 *
* WQSL	222C2	Jacksonville	NC	222.9	83.96	105.5	-21.54 *
WQSL.C	222C2	Jacksonville	NC	214.7	105.83	105.5	0.33 <
AP218	218C2	Atlantic Beach	NC	189.5	62.40	54.5	7.90
WRSV	221A	Rocky Mount	NC	305.6	123.21	114.5	8.71
WMYK.C	221C3	Moyock	NC	19.3	155.59	141.5	14.09
WMYK	221A	Moyock	NC	19.3	155.59	114.5	41.09
WMYK.A	221A	Moyock	NC	19.3	155.59	114.5	41.09

* A license application has been filed for this facility
(BLH-950612KD).

08-31-1995

WILLIAM CULPEPPER & ASSOCIATES

704 365-9995

CH# 211A 90.1 MHz

DUPLIN COUNTY BROADCASTERS

INTERFERENCE CHECKS WITH PROP, NEW BERN, NC at N LAT. 35 09 18 W. LNG. 77 02 05

PWR = 1 kW H.A.A.T. = 50 M C.O.R. = 55 M AMSL

Protected F(50-50) 60 dBu = 13.26 km

F(50-10) 40 dBu = 46.78 54 dBu = 18.25 80 dBu = 4.07 100 dBu = 1.61

CH#	CALL	TYPE	* IN *	* OUT *	BEARING	DISTANCE	LAT.	PWR (kW)	INT (km)	PRO (km)
CITY	STATE	LICENSEE			<---		LNG.	HAAT (M)	COR (M)	FILE #
209C	WCPE.C	CP DCN	107.0	76.4	304.2	157.31 km	35 56 25	100.00	37.00	76.88
Raleigh	NC	Educational Information Co			124.2	97.75 Mi	78 28 45	362.0	462	BPED930125IH
FCC Comment > From channel 209C1										
209C1	WCPE	LI CN	115.6	88.8	304.2	157.31 km	35 56 25	100.00	28.47	64.47
Raleigh	NC	Educational Information Co			124.2	97.75 Mi	78 28 45	207.0	310	BLED930916KC
FCC Comment > *To channel 209C										
210C2	WRVSFM	LI CN	72.0	90.5	30.4	145.51 km	36 16 55	41.00	60.24	36.71
Elizabeth City	NC	Elizabeth City State Unive			210.4	90.42 Mi	76 12 44	70.0	73	BLED910110KD
211A	WHGG	LI CN	109.0	99.2	339.3	155.91 km	36 28 02	0.86	33.70	9.90
Roanoke Rapids	NC	Appalachian Educational Co			159.3	96.88 Mi	77 39 06	26.0	75	BLED1045
211A	WHGG.A	AP CN	94.8	92.7	339.3	152.29 km	36 26 13	0.76	44.21	12.78
Roanoke Rapids	NC	Appalachian Educational Co			159.3	94.53 Mi	77 38 12	53.0	96	BPED950111ID
211C1	WHMCFM	LI DEY	84.8	131.8	235.4	232.51 km	33 57 05	30.00	134.48	53.91
Conway	SC	South Carolina Educational			55.4	144.48 Mi	79 06 31	215.0	235	BLED850215LP
211A	WCCE	LI CN	90.0	96.9	280.9	157.62 km	35 24 36	3.00	54.35	13.89
Buies Creek	NC	Campbell University, Inc.			100.9	97.94 Mi	78 44 21	32.0	99	BLED1308
212C3	WKNS.A	AP CN	21.0	30.9	292.6	76.77 km	35 25 01	7.80	42.49	27.60
Kinston	NC	Craven Community College			112.6	47.70 Mi	77 48 57	84.0	116	BPED950214ME
FCC Comment > From channel 213A-Application Returned 950511-Pet For Recon 950602										
Application reinstated nunc pro tunc 950609										
213A	WKNS	LI CN	31.9	31.6	279.5	49.25 km	35 13 36	3.00	4.14	13.60
Kinston	NC	Craven Community College			99.5	30.60 Mi	77 34 06	30.0	27	BLED1817
FCC Comment > *To channel 212C3										
214C1	WOTJ *	LI CN	32.8	1.6	153.8	52.05 km	34 44 03	60.00	5.50	48.88
Morehead City	NC	Grace Christian School			333.8	32.34 Mi	76 46 58	115.6*	117	BLED881223KA
> Reference HAAT at 153.8 degrees = 53.4 M, Pwr. = 1 kW, Pro Dist = 13.7 km, Int. Dist. = 1.61 km										

I.F. RELATIONSHIPS: NONE FOUND

Nearest CH 6 Grade B =WECT at 15.8 km, Distance= 143.28 Azimuth = 243.8 Deg. T.

* Uses actual antenna radial HAAT and power toward reference

DUPLIN COUNTY BROADCASTERS

TRENTON, NORTH CAROLINA

IDENTIFICATION OF STATIONS SHOWN ON FIGURE 2

WDLX CH 227C WASHINGTON, NC
WNBR CH 231C3 ORIENTAL, NC
WRNS CH 236C KINSTON, NC
WPNC CH 240A PLYMOUTH, NC
WRHT CH 242C1 MOREHEAD CITY, NC
WKZF CH 250A BAYBORO, NC
WCZI CH 252A WASHINGTON, NC
WTND CH 258C2 GRIFTON, NC
WKJA CH 266C2 BELHAVEN, NC
WIKS CH 270C1 NEW BERN, NC
WERX CH 273C2 EDENTON, NC
WKQT CH 277C1 NEWPORT, NC
WCBZ CH 279C1 WILLIAMSTON, NC
WRSF CH 289C1 COLUMBIA, NC
WSFL CH 293C1 NEW BERN, NC
WTKF CH 297C3 ATLANTIC, NC
WNCT CH 300 GREENVILLE, NC

Note: This list contains FM stations only that provide full-time aural service to the area that would be served by the Aurora Broadcasting proposal on channel 283A at Aurora, North Carolina.

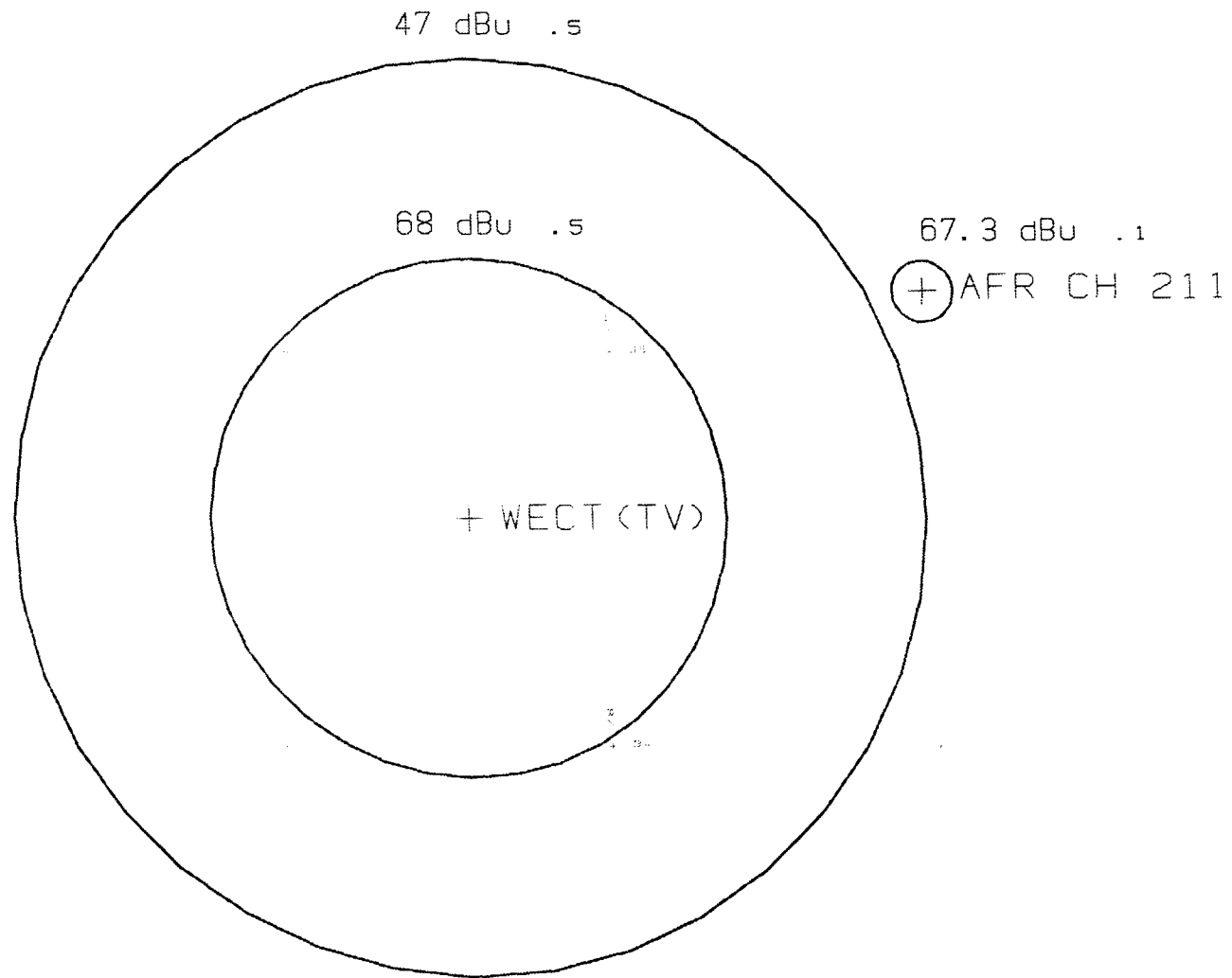
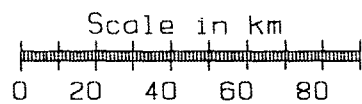


FIGURE 1



WECT (TV) PROTECTED CONTOURS AND THE
67.3 dBu OF CH 211A AT NEW BERN

DUPLIN COUNTY BROADCASTERS
TRENTON, NORTH CAROLINA

ALL SERVICES SHOWN ARE 60 dBu
 CONTOURS OF OPERATING FM STATIONS.
 AURORA CONTOUR SHOWN IN HEAVY LINE.

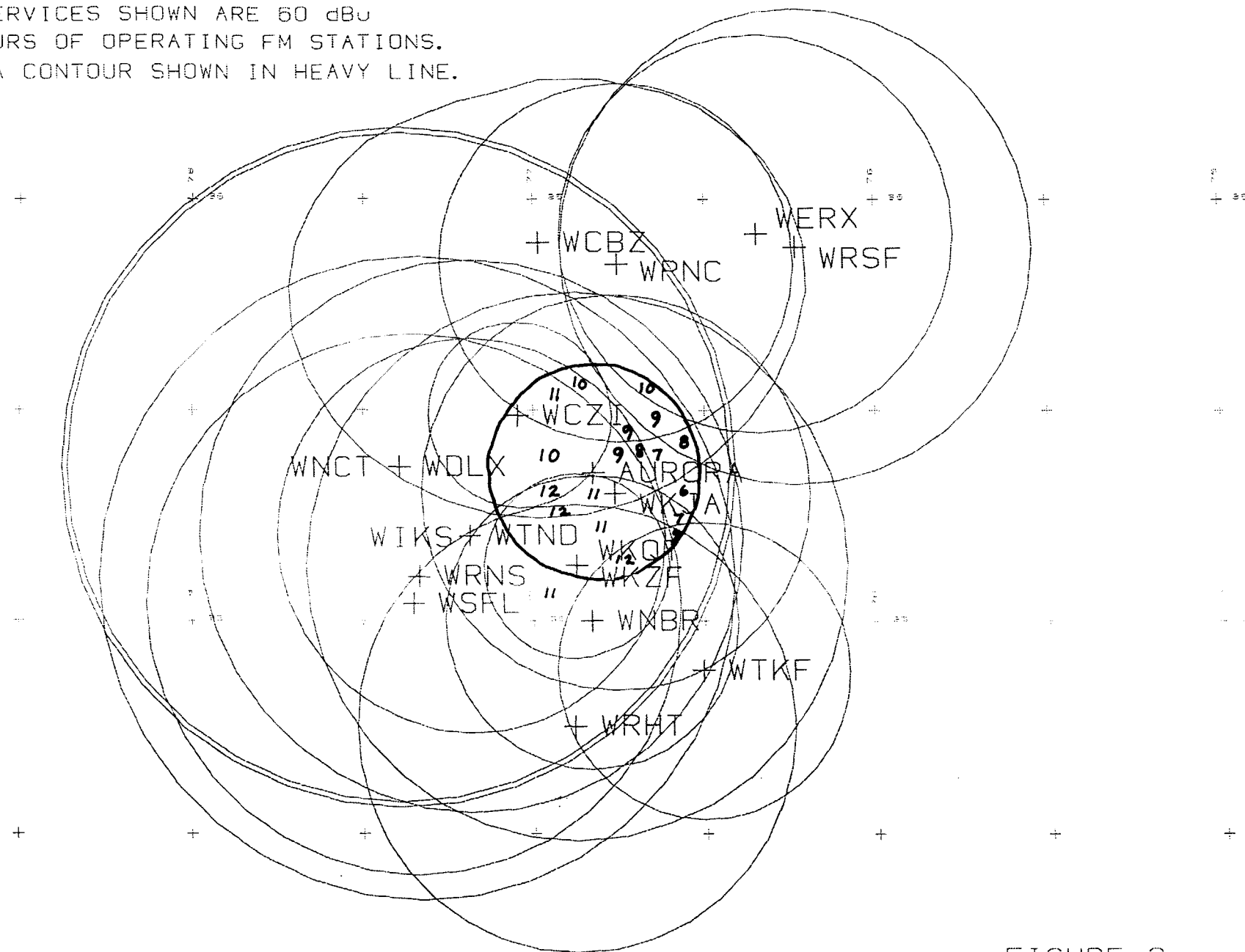


FIGURE 2

Scale in km
 0 10 20 30 40 50 60 70 80 90

AURORA BROADCASTING PROPOSAL AND OTHER
 FULL-TIME AURAL SERVICES

DUPLIN COUNTY BROADCASTING
 TRENTON, NORTH CAROLINA

B

AMERICAN FAMILY RADIO

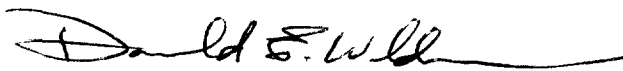
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FAX 601-844-9176

September 1, 1995

Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

This is to advise that American Family Association agrees to file an amendment to it's application for a new Non-commercial Educational FM station in New Bern, North Carolina, to change the proposed frequency from channel 220 to 211. This change will be made to accommodate a proposal for a new Commercial Allotment on channel 221 at Aurora, North Carolina.



Donald Wildmon
President
American Family Association

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Amendment of Section 73.202(b),)	MM Docket No. 95-88
Table of Allotments,)	RM-8641
FM Broadcast Stations.)	
(Rose Hill and Trenton,)	
North Carolina))	

To: Chief, Allocations Branch

REPLY COMMENTS OF DUPLIN COUNTY BROADCASTERS

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August 25, 1995

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EXHIBITS

1. Haritt, Julia Pollack, History & Genealogy of Jones County, NC, "Trenton Historic District," Owen D. Dunn, New Bern, NC (1987)
2. Haritt, supra, "Town of Trenton"
3. Riggs, Sondra Ipock, History of Jones County, NC, NCR 975.621H at page 80
5. Declaration of Joffree Leggett, Mayor of the City of Trenton, North Carolina
6. Declaration of Robert Mason, Jones County Sheriff, Trenton, North Carolina
7. Declaration of Glenn Spivey, Town Clerk, Trenton, North Carolina
8. Excerpts from The Official Directory of Sprint/Carolina Telephone, New Bern (November 1994)
9. North Carolina Cooperative Extension Service, North Carolina State University College of Agriculture & Life Sciences, Jones County Cooperative Extension Summer Programs
10. Haritt, supra, "The John D. Larkins, Jr. Federal Building, Trenton, North Carolina"
11. Haritt, supra, "The Elder Statesman of Trenton"
12. Haritt, supra, "Brock Mill"
13. Engineering Exhibit, by William Culpepper & Associates
14. Declaration of Patricia Platt, Operational Manager, WEGG(AM)/-WBSY(FM)

SUMMARY

Duplin County Broadcasters ("DCB"), licensee of FM Station WBSY, replies to comments filed by Topsail Broadcasting, Inc. ("TPI"), licensee of WZXS(FM), Topsail Beach, North Carolina, and W&B Media, Inc. ("W&B"), licensee of WSFL-FM, New Bern, North Carolina, with respect to DCB's request for an amendment to the FM Table of Allotments, to reassign Channel 284 from Rose Hill to Trenton, North Carolina, upgrade the allotment from Class A to Class C2, and modify the license of WBSY accordingly. DCB's proposal would introduce first local aural service to Trenton, which is not in an Urbanized Area (but is the county seat of Jones County, North Carolina), as well as provide service to increased populations and areas. The proposal would be a preferential arrangement of allotments, as Trenton would receive its first local aural service, while Rose Hill would continue to receive local service from WEGG(AM). Any loss areas would continue to be well-served by at least five aural services.

There is no basis in law or fact to deny Trenton a first local service preference applying the criteria set forth in RKO General, Inc. (KFRC) and Faye and Richard Tuck. When the established criteria are applied to Trenton, it is clear that Trenton is a self-governing, independent and historical community, deserving allotment of its first aural service. Contrary to the Commentors' allegations, Trenton does not depend on, and does not perceive itself as a part of, one or more of the scattered, non-adjacent North Carolina

communities of Jacksonville, New Bern, Kinston, Havelock, and/or Goldsboro mentioned by the Commentors.

It is further demonstrated that Trenton should not be deemed a "quiet village." Allotments have previously been made to communities with attributes similar to Trenton, notwithstanding efforts of objectors to depict those places as falling under the "quiet village" policy.

Although Trenton presently receives aural service from out-of-town stations, it is axiomatic that such reception is not a substitute for local service.

The proposed relocation will not deprive Rose Hill of its only aural service. Rose Hill will continue to be served by WEGG(AM), which is simulcast by WBSY for a substantial part of the day.